

## **REMARKS**

### **Introduction**

Claims 1 – 6 were originally pending in this application. Independent claim 1 has been amended. Claims 2 – 6 have been cancelled. No new matter has been added.

### **Amendments to the Specification**

The Summary of the Invention has been amended to correct typographical errors and more accurately describe the subject matter of the present invention as illustrated in the figures and throughout the remaining portions of the specification.

Attorney for applicants apologizes for these typographical errors.

### **Claim Rejections**

#### **35 U.S.C. § 102 - Anticipation**

Claims 1 – 6 were rejected under 35 U.S.C. § 102(b) as being anticipated by the D'Hooren '251 patent. A claim is said to be anticipated where each and every limitation of the claim can be found in a single prior art reference. Independent claim 1 has been amended to include the limitations previously set forth in claims 2 – 6 and more specifically describe the subject matter of the present invention. In view of the amendments as explained in greater detail below, applicants respectfully submit that each and every limitation of the independent claim in this case cannot be found in the D'Hooren reference. Accordingly, this rejection is respectfully traversed.

## **The Prior Art**

### **The D'Hooren '251 Patent**

The D'Hooren '251 patent is directed toward a method and apparatus for the manufacture of a multilayered object. The apparatus disclosed in the D'Hooren '251 patent is a mold having a male part 1 and a female part 2. Either one of these parts are adapted to compress upon the other to form a multilayered object having a lining sheet and an inner layer 4 of injected thermoplastic resin. (Column 4, Lines 1 – 6). More specifically, the mold parts 1 and 2 compress to form a reserve 9 of thermoplastic resin in the peripheral portion 10 of multilayered object. (Id. and FIGS.1B-1D and 4). The D'Hooren '251 patent further discloses that the mold further includes a means 12 that tucks the excess portion 11 of the lining sheet 3 against the male part 1 until the resin 4 sets (Column 4, Lines 7 – 14).

However, the D'Hooren '251 patent neither discloses nor suggests an injection molding tool for injecting thermoplastic material into a mold cavity using both high pressure injection molding techniques and low pressure injection molding techniques to form a bolster for use in connection with an interior trim component for a vehicle. In addition, the D'Hooren '251 patent neither discloses nor suggests a lifter disposed along the periphery of the mold cavity that actuates between two positions to prevent molten thermoplastic from venting along the periphery of said mold cavity. Finally, the D'Hooren '251 patent neither discloses nor suggests a dual use injection molding tool having a lifter that is actuated in a retracted position for injection of molten thermoplastic into the mold cavity through a low pressure injection molding technique and actuated in an extended position for injection of molten thermoplastic into the mold cavity through a high pressure molding technique, as required by independent claim 1, as amended.

### **The Dual Use Injection Molding Tool of the Present Invention**

In contrast to the D'Hooren '251 patent, the present invention is directed toward a dual use injection molding tool including an injection molding tool having a mold cavity. The dual use injection molding tool of the present invention is adapted to inject molten thermoplastic material into the mold cavity through both low pressure and high pressure injection molding techniques. The mold cavity adapted to form a bolster that is adapted for use in connection with an interior trim component for a vehicle. The dual use injection molding tool of the present invention further includes a lifter operatively engaged to the injection molding tool and disposed along the periphery of the mold cavity. The lifter is adapted to actuate between a retracted, non-functional position and an extended, functional position, to prevent molten thermoplastic from venting along the periphery of the mold cavity. More specifically, the lifter is actuated in a retracted position for injection of molten thermoplastic into the mold cavity through a low pressure injection molding technique and further adapted to actuate into an extended position for injection of molten thermoplastic into the mold cavity through a high pressure molding technique.

### **Argument**

In view of the clarification made to the language of independent claim 1, applicants respectfully submit that the dual use molding tool having lifter that prevents molten thermoplastic from venting along the periphery of the mold cavity to facilitate use of a low pressure injection molding technique as well as a high pressure injection molding technique within a mold cavity to form a bolster for use in connection with an interior trim component for a vehicle is not disclosed or suggested by the D'Hooren '251 patent. Indeed, D'Horren teaches away from preventing molten thermoplastic from venting along the periphery of a mold cavity

and advocates a mold that creates a reserve of thermoplastic resin along the periphery. (Column 4, Lines 31-33). Furthermore, the D'Hooren '251 patent is silent as to whether the disclosed mold is employed for use in connection with high pressure injection molding techniques or low pressure injection molding techniques or both.

Thus, the D'Horren '251 patent neither discloses nor suggests a dual use injection molding tool having a mold tool having a mold cavity and adapted to inject molten thermoplastic material into the mold cavity through both low pressure and high pressure injection molding techniques, to form a bolster adapted for use in connection with an interior trim component for a vehicle. Similarly, D'Horren '251 patent does not disclose or suggest that a dual use injection molding tool having a lifter a lifter operatively engaged to the injection molding tool and disposed along the periphery of the mold cavity where the lifter is adapted to actuate between a retracted, non-functional position and an extended, functional position to prevent molten thermoplastic from venting along the periphery of the mold cavity. Finally, the D'Horren '251 patent neither discloses nor suggests a dual use injection molding tool that includes a lifter that is adapted to actuate in a retracted position for injection of molten thermoplastic into the mold cavity through a low pressure injection molding technique and further adapted to actuate in an extended position for injection of molten thermoplastic into the mold cavity through a high pressure molding technique, as required in independent claim 1, as amended.

There is simply no motivation provided in the D'Hooren '251 references to provide a dual use injection molding tool having a mold cavity and a lifter operatively engaged to the injection molding tool to prevent molten thermoplastic material from venting along the periphery of the mold cavity where the injection molding tool is adapted to employ both high pressure and low pressure injection molding techniques to form a bolster for use in connection with an interior trim component of a vehicle. Similarly, there is no suggestion provided in the D'Hooren '251

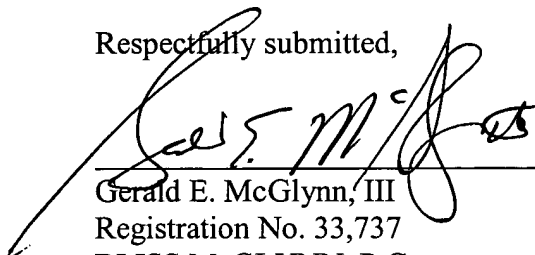
reference for a lifter that actuates between a retracted position for injection of molten thermoplastic into the mold cavity through a low pressure injection molding technique and an extended position for injection of molten thermoplastic into the mold cavity through a high pressure molding technique.

In view of the above, it is respectfully submitted that independent claim 1 recite structure that is not disclosed or suggested by the prior art and that is patentably distinguishable from the subject matter of the reference of record in this case. As such, the prior art reference does not suggest the subject invention. However, even if it did, it could only be applied through hindsight after restructuring the disclosure of the prior art in view of applicants' invention. A rearrangement of the injection molding tool described in this reference to derive applicants' invention would, in and of itself, be an invention.

### **Conclusion**

In view of the above, applicants respectfully submit that the claim, as amended, clearly distinguishes over the prior art and is therefore allowable. Accordingly, applicants respectfully solicit the allowance of the claim pending in this case.

Respectfully submitted,



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